

Jessica P. Sam
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US BANKRUPTCY COURT
DISTRICT OF OREGON

2013 JUN 13 PM 3:13

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PAID _____ DOCKETED _____

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON**

In re)	Case No. 13-32107-elp7
Jessica P. Sam & Ha To Ha)	
<i>Debtors,</i>)	<u>Respond to Trustee's Objections</u>
)	<u>to Claimed Exemptions</u>
)	
)	Written Request for a hearing

RESPOND TO TRUSTEE'S OBJECTIONS TO CLAIMED EXEMPTIONS AND
REQUEST FOR HEARING

COME NOW the Debtors, Jessica P Sam and Ha To Ha are responding to trustee's objections to claim exemptions on bank funds of \$1912.77; cash from wages \$500.00; 2011 Van, 98 Lexus, 85 Van \$6000.00 and request for a hearing.

1. Bank funds of \$1912.77 was inadvertently captured and used as the balance during the date bankruptcy schedules were compiled. This amount was listed mistakenly as we are living from paycheck to paycheck, therefore, at the end of the month, the bank balance is at approximately \$100.00 after all expenses paid. Please see Schedule J for detailed monthly net income. Also see amended schedule J for income changed due to the overtime income is no longer available from Jessica Sam's employer starting May 1st 2013.
2. \$500.00 cash from wages, this was the emergency cash debtors had saved from way before bankruptcy filed. Debtors inadvertently listed as "Cash from wages" but truly can't recall if it was derived from wages. Anyhow, the majority of this


funds \$300.00 were used to pay for the bankruptcy filing fees. See deposit #722735 made to account # 8045 on 4-8-13. All necessary schedules are amended.

3. 2011 Van got reposed, debtors no longer have possession and access to this vehicle.
4. The 98 Lexus is a 15 year old car that needs a lot of maintenance in order for it to arrive at the value that Trustee Kenneth S. Eiler's proposed at \$7625.00. Per Lexus of Portland, it would require to have an entire engine flush at every 80K miles which costs about \$1200.00 in order for any Lexus vehicle to keep its performance and value. This vehicle is at 170K miles that had not had this service done yet. The vehicle right now has "Engine warning light" on that requires fixing. The last diagnose performed six months ago indicated some sensor chips got burned that caused \$350.00 to fix at that time, it could have caused more and other sensor chips could have burned out since. The tag is about to expire in July 2013 that requires about \$150.00 and the above needed to be fixed before it would pass DEQ. The paint on the hood is faded to a point that needs to be repainted or replace the entire hood that would cause another \$1000.00. The tire threads are at bare minimal that needed to be replaced also. Wherefore, this vehicle arrived at the value of \$5500.00 and the 85 Dodge van has a value of \$500.00 which was agreed by the trustee.

Date 6/13/13

Respectfully Submitted,


Jessica P. Sam



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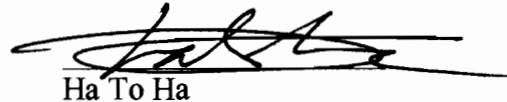
CERTIFICATE OF SERVICE

I hereby certify that on June 13 2013, we mailed a true and correct copy of the above and foregoing motion to the parties listed below.



Handwritten signature of Jessica P. Sam in black ink.

Jessica P. Sam



Handwritten signature of Ha To Ha in black ink.

Ha To Ha

Trustee- Kenneth S. Eiler
PMB 810
515 SW Saltzman Rd.
Portland, OR 97229

US Trustee
620 SW Main Room # 213
Portland, OR 97205

via hand delivery .